

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CITY OF BROCKTON RETIREMENT  
SYSTEM, Individually and on Behalf of all  
Others Similarly Situated,

Plaintiffs,

-vs-

AVON PRODUCTS, INC., ANDREA  
JUNG, and CHARLES W. CRAMB,

Defendants.

Civil Action No. 11 Civ. 4665 (PGG)

**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR  
FINAL APPROVAL OF SETTLEMENT AND PLAN OF ALLOCATION**

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*Counsel for Named Plaintiffs City of  
Brockton Retirement System and the  
Louisiana Municipal Police Employees'  
Retirement System*

DATED: October 27, 2015

PLEASE TAKE NOTICE that on December 1, 2015, at 10:00 a.m. at the United States District Court for the Southern District of New York, 40 Foley Square, Courtroom 705, New York, NY 10007, Lead Plaintiffs LBBW Asset Management Investmentgesellschaft mbH and Société Générale Securities Services GmbH (collectively, “Lead Plaintiffs”), and Named Plaintiffs City of Brockton Retirement System, Metropolitan Water Reclamation District Retirement Fund, and Louisiana Municipal Police Employees’ Retirement System (collectively, “Named Plaintiffs,” and, with Lead Plaintiffs, “Plaintiffs”), on behalf of the proposed Class,<sup>1</sup> will respectfully move this Court, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, for orders granting final approval of (a) the proposed Settlement (including entry of the [Proposed] Final Judgment Approving Class Action Settlement in the form previously annexed as Exhibit B to the Stipulation and Agreement of Settlement (ECF No. 71-2)), and (b) the Plan of Allocation. At that same time, Plaintiffs will seek final certification of the Class as provided for in the [Proposed] Final Judgment, the appointment of Plaintiffs as Class Representatives, and the appointment of Lead Counsel as Class Counsel. Defendants do not oppose this motion. Plaintiffs will submit a [Proposed] Revised Final Judgment (annexing a table of all timely and valid exclusion requests) together with Plaintiffs’ reply papers in further support of final approval of the Settlement on November 24, 2015 (following the November 10, 2015 deadline for the submission of exclusion requests).

PLEASE TAKE FURTHER NOTICE that, in support of the motion, Plaintiffs submit and are filing herewith: Plaintiffs’ Memorandum of Law in Support of Motion for Final Approval of Settlement and Plan of Allocation, dated October 27, 2015; and the Declaration of Gregg S. Levin in Support of (i) Plaintiffs’ Motion for Final Approval of Settlement and Plan of

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<sup>1</sup> Capitalized terms not defined in this Notice of Motion and Motion have the meaning ascribed to them in the Stipulation and Agreement of Settlement dated as of July 22, 2015.

Allocation, and (ii) Lead Counsel's Motion for Attorneys' Fees, Reimbursement of Litigation Expenses, and Reimbursement of Plaintiffs' Expenses, dated October 27, 2015, with annexed exhibits.

Respectfully submitted,

Dated: October 27, 2015

MOTLEY RICE LLC

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*- All Plaintiffs' counsel consent to the use of their electronic signatures. -*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 27, 2015, I caused Plaintiffs' Notice of Motion and Motion for Final Approval of Settlement and Plan of Allocation to be served by the Court's Electronic Case Filing system upon:

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Dated: October 27, 2015  
Mt. Pleasant, SC

/s/ Gregg S. Levin  
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